

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

J.G.	:	CIVIL ACTION
	:	
Plaintiff,	:	11-2887 (WJM/MF)
	:	
v.	:	
	:	
C.M.	:	
	:	
Defendant.	:	
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C.M.	:	
	:	
Third-Party Plaintiff,	:	
	:	
v.	:	
	:	
V.G., N.G. and Mary Jo Lynch	:	
	:	
Third-Party Defendants.	:	

**MOTION TO CORRECT FEBRUARY 24, 2015 RECORD**

TO: Paul R. Rizzo, Esquire  
DiFrancesco, Bateman, Coley, Yospin  
Kunzman, Davis & Lehrer, P.C.  
15 Mountain Boulevard  
Warren, NJ 07059

Andrew R. Macklin, Esquire  
Cohn, Lifland, Pearlman, Herrmann & Knopf, LLP  
Park 80 West - Plaza One  
250 Pehle Avenue, Suite 401  
Saddle Brook, NJ 07663

**PLEASE TAKE NOTICE**, that the undersigned attorney for Counterclaim Defendant J.G. and Third-Party Defendants V.G. and N.G., will move before the United States District Court, District of New Jersey, Newark Vicinage on Monday, April 6, 2015 at 9:00 a.m. or as soon thereafter as counsel may be heard for an Order correcting the February 24, 2015 record.

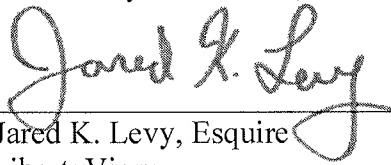
The undersigned counsel will rely on the attached Declaration, party affidavits and memorandum of law in support of this application.

Respectfully submitted,

**WHITE AND WILLIAMS LLP**

Attorneys for Counterclaim Defendant, J.G.  
and Third-Party Defendants, V.G. and N.G.

By:

  
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Dated: March 10, 2015